

**Fadely, Karen**

**From:** Silawsky, Donald [Donald.Silawsky@hq.doe.gov]  
**Sent:** Tuesday, October 18, 2005 10:45 AM  
**To:** Fadely, Karen  
**Subject:** FW: Scoping for the SPR EIS

KAREN: Another SPR EIS scoping comment.

DON SILAWSKY

-----Original Message-----

From: Cassingham, Bertha  
 To: Silawsky, Donald  
 Sent: 10/17/2005 4:41 PM  
 Subject: Scoping for the SPR EIS

> Good Afternoon,  
 >  
 > Please accept this e-mail as a written comment regarding the scope of  
 the  
 > EIS for expanding the capacity of the Strategic Petroleum Reserve.  
 >  
 > Background:  
 > The Energy Policy Act of 2005 enacted on August 8, 2005 directs the  
 > Secretary of Energy to no later than 1 year after enactment, to select  
 > sites necessary to expand the SPR from its current 727 million-barrel  
 > capacity to 1 billion barrels. An expansion planning directive issued  
 in  
 > 1990 resulted in a Report to Congress on Candidate Sites for Expansion  
 of  
 > the Strategic Petroleum Reserve to One Billion Barrels, and  
 preparation of  
 > a Draft EIS which assessed 5 candidate sites, subsequently 2 of those  
 > sites have been removed from consideration, yet, Section 303 of the  
 EPACT  
 > directs that: "the Secretary shall complete a proceeding to select,  
 from  
 > sites that the Secretary has previously studied, sites necessary to  
 enable  
 > acquisition by the Secretary of the full authorized volume of the  
 > Strategic Petroleum Reserve. In such proceeding, the Secretary shall  
 > first consider and give preference to the five sites which the  
 Secretary  
 > previously addressed in the Draft EIS. However, the Secretary, in his  
 > discretion, may select other sites as proposed by a State where a site  
 has  
 > been previously studied by the Secretary to meet the full authorized  
 > volume of the Strategic Petroleum Reserve."  
 >  
 > Comments:  
 > It appears that the following facts and related impacts have not been  
 > fully incorporated into this decision making process:  
 > 1. The 1990 Report on Candidate Sites was issued before the terrorism  
 > concerns became more obvious on 9-11-2001. The closer proximity of the  
 > current SPR facilities, and the sites currently proposed, may not be  
 ideal  
 > as all are located on the coast and have related homeland security

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> concerns

> 2 It does not address the facts that two of those facilities have been removed from consideration.

> 3. The destruction of Hurricanes Katrina & Rita make it more obvious that an additional SPR facility needs to be located in a completely separate part of the country to ensure reserves are available as needed.

>

> Request:

> Since only those 5 sites were reviewed, the EPACT wording regarding "that the Secretary, in his discretion, may select other sites where a site has been previously studied by the Secretary" must be assumed to mean a site which has been previously studied by the Secretary initially for another project, but means that the evaluation of the geology, the natural disaster history, etc. has already been conducted (an EIS for another purpose) and thus could be re-evaluated for SPR site selection in a timely and financially responsible manner. Based on that assumption, I would like to request that the a portion of the Land Withdrawal Act lands for the Department of Energy's Waste Isolation Pilot Plant Project located at Carlsbad, New Mexico as previously studied by the Secretary be evaluated for feasibility and possible selection for additional capacity for the Strategic Petroleum Reserves. As demonstrated on the maps from the 2005 Energy Plan, the southeast region of New Mexico already has extensive pipeline systems, including from Old Mexico, and could easily supply a completely different group of refineries for the Southwest portion of the country when needed.

>


> In addition, in order to assist the DOE in meeting its mandate to "take steps to ensure America has adequate refining capacity to meet the needs of consumers", that this SPR facility be built at Carlsbad and consider including a full energy research center consisting of a National Oil Refinery (providing an emergency use blend and serving as research facility for Los Alamos National Lab, and Sandia National Lab, and various academia for the following research needs as identified in the May 2002 Energy Policy, examples include:

> \* Biosciences- to provide environmental and performance improvements in fuel and chemical processing like desulfurization and dematation of crude oils and refinery product streams

> \* Hydrogen production research as by-product of process.

> \* New catalytic material research to provide improvement in processes and lead to new chemistry and concepts in refining--including in-line measurement technologies

- > \* Further research on the CRADA by Sandia--toxic combustion by-products
- > including emissions from petrochemical process heaters
- > \* Air Quality Modeling improvements with related sampling and analytical
- > methods for particulate matter sized under 2.5 microns.
- > \* Phytoremediation research to determine the optimum approach for
- > phytoremediation of polynuclear aromatic hydrocarbons, oxygenates, and
- > heavy metal contaminated soil
- > \* Research on alloy selection system for elevated temperatures such as
- > corrosion of metals and alloys by high temperature gases. Research should
- > lead to the development of a computer program to predict the corrosion
- > rate for different materials based on a fundamental understanding of
- > atomic and molecular structures.
- > \* The specific target areas from the U.S. Petroleum Industry Research
- > Needs for Energy Efficiency report table on fouling mitigation, membranes
- > for hydrocarbon separations, catalytic distillation, and entirely new
- > low-energy separation technologies.
- > \* By working on a national blend for emergencies, could assist in
- > defining more appropriate blend approach and use nationwide.
- >
- > As the research refinery developed new techniques, more cost-effective
- > methodologies, through technology transfer they would be shared with the
- > public sector such as independent producers. In addition, with the level
- > of expertise involved through the National Labs and Academia, could
- > address with the Environmental Protection Agency which regulatory
- > requirements add significant cost without gain, and assist in defining
- > effective and efficient set of standards for use nationwide, thus
- > encouraging additional refinery development and production. Since the
- > facility would be part of a national reserve, there would be no
- > competition with private industry in final product. And since the DOE
- > also has a Border States Initiative Office in Carlsbad, they are ideally
- > suited to use this research facility to facilitate sharing production
- > technologies and training with Mexico, and of course other countries.
- >
- > Other components of such a National Energy Research Facility could include
- > natural gas (again the policy maps show SE New Mexico's ideal location),
- > back-up power capacity location for the electric grid (again notice our
- > location as the only region with access to all 3 grids that make up the
- > national grid system.), etc.
- >
- > Why Carlsbad?
- > \* There is already a DOE Field Office.
- > \* Our geologic salt formation potential for SPR.
- > \* Our obvious strategic location.
- > \* The WIPP Land Withdrawal Area
- > \* 2 National Labs with branch locations already in Carlsbad, NM.
- > \* Private industry experience in the oil production arena.
- > \* Experience through WIPP in serving in a unique international focus
- > capacity-sharing technology with scientists and serving as a world class

> facility--safely pioneering new methodologies based on sound proven  
 > science  
 > \* WIPP is a DOE disposal facility for transuranic low level and mixed  
 > waste facility located 2,500 underground basically in a salt mine.  
 Though  
 > of course the SPR would not be located at WIPP, the Land Withdrawal  
 Act  
 > for WIPP includes 16 sections of the same geologic formation so should  
 be  
 > appropriate siting for a separate facility on those DOE lands.  
 >  
 > To reiterate:  
 > 1. This comment states that the sites previously considered did not  
 > sufficiently address the risks of localization of facilities in  
 disrupting  
 > supplies, so that DOE needs at least one facility in another portion  
 of  
 > the country---away from the current SPR.  
 > 2. This comment states that it is our interpretation that the  
 Secretary  
 > can consider other potential sites if already evaluated by DOE for  
 other  
 > roles since the related research regarding geologic potential, natural  
 > disaster history, etc. would be the same.  
 > 3. This comment serves as a request to please add federal lands in  
 the  
 > Carlsbad, NM area to the potential "sites" to be considered for SPR.  
 > 4. This comment expands beyond the SPR discussion to include  
 discussion  
 > of the need for production capacity and research capabilities.  
 Requesting  
 > that if an SPR facility were located in Carlsbad, NM, that those  
 > capacities and capabilities be considered in a joint EIS as they  
 could  
 > have a synergistic effect and significant impact in assisting in  
 meeting  
 > DOE and the Nation's future Energy needs and goals;  
 > \* Enhance Strategic Petroleum Reserve capacity (and availability  
 based  
 > on  
 >     varying location)  
 > \* Enhance U.S. economic and energy security by increasing refining  
  
 >     capacity.  
 > \* Foster enhanced energy production through  
 > implementation/demonstration  
 >     of improved refinery technologies.  
 > \* Develop additional energy import sources (through sharing  
 production  
 >     technologies)  
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 > Respectfully,  
 > Bertha Cassingham  
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